

EXHIBIT C

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 No. 1:12-cv-2296-TCB

5 SECURITIES AND EXCHANGE
6 COMMISSION,

7 Plaintiff,

8 vs.

9 AUBREY LEE PRICE; et al,

10 Defendants.

11 _____/

12 1000 Brickell Avenue
13 Miami, Florida
14 December 15, 2014
15 1:09 p.m. - 6:04 p.m.

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17 DEPOSITION OF MELANIE F. DAMIAN

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19 Taken before SUZANNE VITALE, R.P.R., F.P.R.

20 and Notary Public for the State of Florida at Large,

21 pursuant to Notice of Taking Deposition filed in the

22 above cause.

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1 correct?

2 A. Correct.

3 Q. And it's your contention in this lawsuit
4 that, despite the fact that Mr. Price is alive, that
5 you don't have to return these proceeds to
6 Protective and Household, correct?

7 A. Correct.

8 Q. Tell me all the facts why you contend
9 that?

10 A. I think we're still working on the facts.
11 But, essentially, it's our position that the
12 payments were voluntary under the Florida Voluntary
13 Payment Code or statute, and so in terms of the
14 facts we provided, we believe a good faith claim to
15 the insurance companies with the information we had
16 at the time that Mr. Price was missing, had sent a
17 suicide note, had told his family he was killing
18 himself, and that there was no evidence of him being
19 alive after I guess it's June 16th. I don't
20 remember exactly the date that he called his wife
21 and said he was on the ferry.

22 But the date of his ferry, there was no
23 evidence after that of him being alive and we
24 provided that information, along with the
25 presumptive death certificate, to the insurance